

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

GEICO CORPORATION
GOVERNMENT EMPLOYEES INSURANCE
COMPANY
GEICO GENERAL INSURANCE COMPANY
GEICO INDEMNITY COMPANY
GEICO CASUALTY COMPANY
GEICO ADVANTAGE INSURANCE COMPANY
GEICO CHOICE INSURANCE COMPANY
GEICO SECURE INSURANCE COMPANY
GEICO COUNTY MUTUAL INSURANCE
COMPANY

Plaintiffs,

v.

AUTOLIV, INC.
AUTOLIV ASP, INC.
AUTOLIV B.V. & CO. KG
AUTOLIV SAFETY TECHNOLOGY, INC.
AUTOLIV JAPAN LTD.
HITACHI AUTOMOTIVE SYSTEMS, LTD.
LEAR CORPORATION
KYUNGSHIN-LEAR SALES AND
ENGINEERING, LLC
PANASONIC CORPORATION
PANASONIC CORPORATION OF NORTH
AMERICA
T.RAD CO. LTD.
T.RAD NORTH AMERICA
TRW DEUTSCHLAND HOLDING GMBH
ZF TRW AUTOMOTIVE HOLDINGS
CORPORATION

Defendants.

Case No. 16-13189

Judge: Hon. Marianne Battani

Magistrate Judge: Hon. Mona
Majzoub

**STIPULATION AMENDING
CONSOLIDATED
RESPONSIVE PLEADINGS
AND MOTIONS BRIEFING
SCHEDULE**

Plaintiffs GEICO Corporation, Government Employees Insurance Co., GEICO General Insurance Co., GEICO Indemnity Co., GEICO Casualty Co., GEICO Advantage Insurance Co., GEICO Choice Insurance Co., GEICO Secure Insurance Co., GEICO County Mutual Insurance Co. (“Plaintiffs”) and Defendants Autoliv, Inc., Autoliv ASP, Inc., Autoliv B.V. & Co. KG; Autoliv Safety Technology, Inc., Autoliv Japan Ltd., Hitachi Automotive Systems, Ltd., Kyungshin-lear Sales and Engineering, LLC, Lear Corporation, Panasonic Corporation and Panasonic Corporation of North America, T.RAD Co., Ltd., T.RAD North America, Inc., TRW Deutschland Holding GmbH, and ZF TRW Automotive Holdings Corporation (collectively, “Defendants”), by and through their undersigned counsel, stipulate as follows:

WHEREAS Plaintiffs filed their Complaint on September 2, 2016 and subsequently filed an Amended Complaint on November 9, 2016.

WHEREAS Defendants agreed to waive service pursuant to Federal Rule of Civil Procedure 4(d) and acknowledge receipt of the Amended Complaint.

WHEREAS Plaintiffs and Defendants agreed upon a consolidated schedule for filing pleadings and motions in response to the Amended Complaint and subsequent briefing, setting an initial response date of March 31, 2017.

WHEREAS, if Defendants file Motion(s) in response to the Amended Complaint, Plaintiffs and Defendants agreed that Plaintiffs will file their Response(s) to the Motion(s) by May 30, 2017.

WHEREAS Plaintiffs and Defendants agreed that Defendants will file their Reply or Replies in support of their Motion(s) by July 14, 2017.

WHEREAS Plaintiffs are filing a Second Amended Complaint contemporaneously with this Stipulation.

WHEREAS Plaintiffs and Defendants have agreed upon an extension of time for Defendants to file pleadings and motions in response to the Second Amended Complaint.

NOW THEREFORE, IT IS HEREBY STIPULATED, subject to Court approval, the following schedule shall govern the timing for filing responsive pleadings to the Second Amended Complaint and any subsequent briefing:

1. Defendants do not oppose Plaintiff's filing of the Second Amended Complaint.
2. Defendants will file Pleadings or Motions in response to the Second Amended Complaint by **Friday, April 14, 2017**.
3. If Defendants file Motion(s) in response to the Second Amended Complaint, Plaintiffs will file their Response(s) to the Motion(s) by **Tuesday, June 13, 2017**.

4. Defendants will file their Reply or Replies in support of their Motion(s) by

Friday, July 28, 2017.

Date: March 17, 2017

Respectfully submitted,

/s/ Rebecca J. S. Cassell

MYERS & MYERS, PLLC

Kelly A. Myers (P49143)

kmyers@myers2law.com

Rebecca J. Cassell (P64456)

rcassell@myers2law.com

915 N. Michigan Avenue

Howell, MI 48843

(517) 540-1700

*Attorneys for Plaintiffs with respect to their
claims against the TRW Defendants and as local
counsel for the remainder of Plaintiff's claims*

/s/ Dan Goldfine

LEWIS ROCA ROTHGERBER CHRISTIE

LLP

Dan Goldfine (Adm ED MI, AZ Bar 018788)

dgoldfine@lrrc.com

201 East Washington St.

Suite 1200

Phoenix, AZ 85004

602-262-5392

Frederick J. Baumann (Adm ED MI, CO Bar
12156)

fbaumann@lrrc.com

Diane R. Hazel (Adm ED MI, CO Bar 42954)

dhazel@lrrc.com

1200 17th Street

Suite 3000

Denver, CO 80202

*Attorneys for Plaintiffs with respect to their
claims against all Defendants except the TRW
Defendants*

/s/ Alden Atkins (with permission)

Alden Atkins

VINSON & ELKINS LLP

2200 Pennsylvania Ave. NW

Suite 500 West

Washington, DC 20037

202-639-6585

aatkins@velaw.com

Attorney for Hitachi Automotive Systems, Ltd.

/s/ Peter Kontino (with permission)

Peter Kontio

Meredith Jones Kingsley

ALSTON & BIRD LLP

One Atlantic Center

1201 West Peachtree Street

Suite 4900

Atlanta, GA 30309-3424

404-881-7000

peter.kontio@alston.com

meredith.kinglsey@alston.com

*Attorneys for Autoliv, Inc., Autoliv ASP, Inc.,
Autoliv B.V. Co. KG, Autoliv Safety
Technology, Inc., Autoliv Japan Ltd.*

/s/ Peter Fakenstein (with permission)

Peter M. Falkenstein
JAFFE RAITT HEUER & WEISS
535 W. William Street
Suite 4005
Ann Arbor, MI 48103-4978
734-222-4776
pfalkenstein@jaffelaw.com
Attorney for Kyungshin-Lear Sales and Engineering, LLC

/s/ Andrew Marovitz (with permission)

Andrew S. Marovitz
MAYER BROWN LLP
71 S. Wacker Drive
Chicago, IL 60606-4637
312-701-7116
amarovitz@mayerbrown.com
Attorney for Lear Corporation

/s/ Peter Simmons (with permission)

Peter L. Simmons
FRIED, FRANK, HARRIS, SHRIVER &
JACOBSON LLP
One New York Plaza
New York, NY 10004
212-859-8455
peter.simmons@friedfrank.com
Attorney for T.RAD Co. Ltd. and T.RAD North America, Inc.

/s/ Jeff Amato (with permission)

Jeff Amato
WINSTON & STRAWN LLP
200 Park Avenue
New York, NY 10166
212-294-4685
jamato@winston.com
Attorney for Panasonic Corporation and Panasonic Corporation of North America

/s/ Howard Iwrey (with permission)

Howard B. Iwrey (P39635)
Cody D. Rockey (P78653)
DYKEMA GOSSETT PLLC
39577 Woodward Avenue, Suite 300
Bloomfield Hills, MI 48304
(248) 203-0700 (Telephone)
(248) 203-0763 (Facsimile)
hiwrey@dykema.com
crockey@dykema.com
Attorneys for TRW Deutschland Holding GmbH and ZF TRW Automotive Holdings Corporation